



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 15 1997

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the
Surface Impoundment Unit for the Oak Ridge National Laboratory Site

FROM: Bruce K. Means, Chair *BK Means*
National Remedy Review Board

TO: Richard D. Green, Acting Director
Waste Management Division
EPA Region 4

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the Surface Impoundment Operable Unit of the Oak Ridge National Laboratory site in Oak Ridge, Tennessee. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost (and thus potentially controversial) proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative.

The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's current

delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the site package for the Oak Ridge site and discussed related issues with EPA Remedial Project Manager Edward Carreras on July 30, 1997. Based on this review and discussion, the NRRB:

- Finds that the Department of Energy (DOE) proposal does not adequately demonstrate the cost effectiveness and environmental benefits of the preferred alternative (off-site disposal). Based on the proposed plan, other alternatives are protective and achieve remedial objectives at significantly lower cost.
- Finds that the absence of a site wide management plan impairs the remedy selection process for this facility. The Board understands that DOE will conduct a number of actions at the Oak Ridge reservation. In order to enhance the cost effectiveness of overall site remediation, the Board strongly recommends a comprehensive site-wide waste management plan be developed expeditiously. This plan should address the feasibility of the centralized waste management facility described as a contingency under alternative 6 in the proposed plan. However, development of this plan should not delay timely and appropriate action for the impoundment areas.

The NRRB appreciates the Region's efforts to work closely with the State and community to identify the current proposed remedy. The Board members also express their appreciation to the Region for their participation in the review process. We encourage Region 4 management and staff to work with their Regional NRRB representative and the Region 4/10 Accelerated Response Center at Headquarters to discuss any appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
T. Fields
B. Breen
E. Cotsworth
J. Woolford
J. Cunningham